

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

IN RE: Sean Thomas Hite
Melinda Dale Hite

Case no: 15-51191

APPLICATION TO QUASH GARNISHMENT

TO THE HONORABLE REBECCA B. CONNELLY, U.S. BANKRUPTCY JUDGE

Comes now your applicants, Sean Thomas Hite and Melinda Dale Hite, by counsel, pursuant to Bankruptcy Code §362(a), and respectfully represents as follows:

1. That your applicants have filed a petition for relief under Chapter 13 of Title 11 of the United States Code.
2. That your applicant Sean Thomas Hite is subject to a garnishment issued by the Augusta County General District Court, 6 East Johnson Street, Staunton, VA 24401 within 90 days of the filing of the above named petition.
3. That said garnishment is in favor of AmeriCredit Financial Services, c/o Tui Curiel, Esq., 9210 Corporate Blvd., Suite 350, Rockville, MD 20850, and has a return date of February 8, 2016. Garnishee, DuPont Community Credit Union, P.O. Box 1365, Waynesboro, VA 22980, has funds **from frozen bank account** belonging to your applicant Sean Thomas Hite.

WHEREFORE, your applicants pray that said garnishment be quashed and that the Court order such other and further relief as the nature of this case may require. Copies hereof were mailed to the debtor, creditor, the general district court, and the garnishee.

Respectfully submitted,

/s/ Roland S. Carlton, Jr.

Roland S. Carlton, Jr., Esq.